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U.S. District Court Northern District of West Virginia (Martinsburg) CRIMINAL DOCKET FOR CASE #: 3:24-cr-00003-GMG-RWT-68

Case title: USA v. Brown, et al

Date Filed: 01/17/2024

Assigned to: District Judge Gina M Groh Referred to: Magistrate Judge Robert W.

Trumble

Defendant (68)

Jamie Lee Sullivan

Pending Counts

Disposition

CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCE (2)

<u>Highest Offense Level (Opening)</u>

Felony

Terminated Counts

Disposition

None

Highest Offense Level (Terminated)

None

Complaints

Disposition

None

Plaintiff

USA

represented by Eleanor F. Hurney

U.S. Attorney's Office - Mrt. U.S. Courthouse 217 W. King Street, Suite 400 Martinsburg, WV 25401

(304) 262-4802 Fax: (304) 262-0591

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Date Filed	#	Docket Text	
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01/17/2024	1	INDICTMENT WITH FORFEITURE ALLEGATION as to Gary Bernard Brown, Jr. (1): counts 1-2, 3, 10; Eric Anthony Garner (2): counts 1-2; Saul Percy Powell, Jr. (3): counts 1-2; Gary Brown, III (4): counts 1-2; Gary Alexander Rodriguez (5): counts 1-2; Charles Delroy Singletary (6): counts 1-2; Sherron Briana Roberts (7): count 2; Deborah Rosemarie Johnson (8): counts 2, 4, 15; Patrick Thomas Marple (9): counts 2, 4; Darien Jacob Horton (10): counts 2, 8; Jeffrey Lee Pullen (11): count 2; Christopher Sterling Cogle (12): count 2; Amber Jean Davis (13): count 2; Eric Lyn Custer (14): counts 2, 5-6; Benjamin Paul Knotts (15): counts 2, 7; Ashleigh Rae Settle (16): count 2; Kaitlyn Ashley Knight (17): count 2; John Andrew Cassell (18): counts 2, 11; Kristina Bridget Huth (19): counts 2, 18; Andrew Aiyetoro Wilkerson (20): count 2; Damian Antheny Costello (21): count 2; Haile Madalynn Speaks (22): count 2; Eva Louise Ashbaugh (23): counts 2, 16, 17; Kayleigh Nicole Beavers (24): counts 2, 20; Ashley Nicole Story (25): count 2; Michael Lee Engle (26): counts 2, 23; Ryan Bennet Cole (27): counts 2, 24; Joshua Paul Barrett (28): counts 2, 25; Amanda Nicole Long (29): count 2; Gregory Brian Long (30): counts 2, 13, 32; Paul Perekrests (31): counts 2, 28, 29-30; Scott Alan Sheffer (32): count 2; Samantha Helen Hott (133): count 2; James Sanford (34): counts 2, 26; Linda Carasse Abshire (37): count 2; Amanda Nicole Albert (38): counts 2, 21; James Beau Baker (39): counts 2, 19; Kendall Axavier Baker (40): counts 2, 29-30; Kimberly Ann Barrett (41): counts 2, 25; Jennifer Nicole Barthlow (42): counts 2, 31; Ryan James Brennan (43): count 2; Gary Michael Burns (44): count 2; Lanee Wade Cole, Jr (45): count 2; Wendy Diane Crites (46): counts 2, 21: Jeremy Jason Crock (47): counts 2, 33-34; Martha Ann Crock (48): counts 2, 23; Brooke Gordon (53): count 2; Jamas Richelle Fleetwood (52): counts 2, 23; Brooke Gordon (53): count 2; Jamas Richelle Fleetwood (52): counts 2, 23; Brooke Gordon (53): count 2; Jamas Richelle Fleetwood (52): co
01/17/2024	2	ORDER ***SEALED***. Signed by District Judge Gina M. Groh on 01/17/2024. (cwm) Copies of this Order to the United States Attorney (William J. Ihlenfeld and Lara Omps-Botteicher), the Federal Public Defender (Brian Kornbrath), the United States Marshals Service, and the United States Probation Office for the Northern District of West Virginia. (Entered: 01/17/2024)
01/17/2024	3	*SEALED* Indictment - Unredacted, re: 1 Indictment as to Gary Bernard Brown, Jr, Eric Anthony Garner, Saul Percy Powell, Jr, Gary Brown, III, Gary Alexander Rodriguez, Charles Delroy Singletary, Sherron Briana Roberts, Deborah Rosemarie Johnson, Patrick Thomas Marple, Darien Jacob Horton, Jeffrey Lee Pullen,

Christopher Sterling Cogle, Amber Jean Davis, Eric Lyn Custer, Benjamin Paul Knotts, Ashleigh Rae Settle, Kaitlyn Ashley Knight, John Andrew Cassell, Kristina Bridget Huth, Andrew Aiyetoro Wilkerson, Damian Antheny Costello, Haile Madalynn Speaks, Eva Louise Ashbaugh, Kayleigh Nicole Beavers, Ashley Nicole Story, Michael Lee Engle, Ryan Bennet Cole, Joshua Paul Barrett, Amanda Nicole Long, Gregory Brian Long, Paul Perekrests, Scott Alan Sheffer, Samantha Helen Hott, James Sanford, Lynn Wood Campbell, Nathaniel Frederick Downing, Jr, Linda Carasse Abshire, Amanda Nicole Albert, James Beau Baker, Kendall Axavier Baker, Kimberly Ann Barrett, Jennifer Nicole Barthlow, Ryan James Brennan, Gary Michael Burns, Lance Wade Cole, Jr, Wendy Diane Crites, Jeremy Jason Crock, Martha Ann Crock, Michael Bradley Decker, Zachary Thomas Doman, Tiffany Amber Fitch, Jama Richelle Fleetwood, Brooke Gordon, Marissa Gregory-Huntoon, Gary Edison Harder, Jr, Brenda Henry, John Ernest Lecluse, Michael Regale Luckett, Jeffrey Scott Main, Alyssa Rose Mcintyre, Connor James Mclaughlin, Jessica Lynn Mclaughlin, CJ Morgan, Nicole Parkinson, David Lewis Pennington, Jr, Delmar Seal, Jr, Cody Allen Sorrell, Jamie Lee Sullivan, Dusty Lynn Thompson, Shelby Elizabeth Thompson, Dante Dupe Washington, Clifford Eugene Weaver, Bradley David Welsh, April Dawn Wentzell, Autumn D. Wilson, Mary Ann Wright, John Wesley Yates, Cynthia Renee Young, Aaron Joshua James, Matthew David Viands, Daniel Lee Corbin, Jr, and Jeremy Tyler Shifflett. (cwm) Attachments # 1 Grand Jury Docket Sheets) (cwm). (Entered: 01/18/2024)

01/17/2024

ORDER TO SEAL granting 4 Motion to Seal as to Gary Bernard Brown Jr. (1), Eric Anthony Garner (2), Saul Percy Powell Jr. (3), Gary Brown III (4), Gary Alexander Rodriguez (5), Charles Delroy Singletary (6), Sherron Briana Roberts (7), Deborah Rosemarie Johnson (8), Patrick Thomas Marple (9), Darien Jacob Horton (10), Jeffrey Lee Pullen (11), Christopher Sterling Cogle (12), Amber Jean Davis (13), Eric Lyn Custer (14), Benjamin Paul Knotts (15), Ashleigh Rae Settle (16), Kaitlyn Ashley Knight (17), John Andrew Cassell (18), Kristina Bridget Huth (19), Andrew Aiyetoro Wilkerson (20), Damian Antheny Costello (21), Haile Madalynn Speaks (22), Eva Louise Ashbaugh (23), Kayleigh Nicole Beavers (24), Ashley Nicole Story (25), Michael Lee Engle (26), Ryan Bennet Cole (27), Joshua Paul Barrett (28), Amanda Nicole Long (29), Gregory Brian Long (30), Paul Perekrests (31), Scott Alan Sheffer (32), Samantha Helen Hott (33), James Sanford (34), Lynn Wood Campbell (35), Nathaniel Frederick Downing Jr. (36), Linda Carasse Abshire (37), Amanda Nicole Albert (38), James Beau Baker (39), Kendall Axavier Baker (40), Kimberly Ann Barrett (41), Jennifer Nicole Barthlow (42), Ryan James Brennan (43), Gary Michael Burns (44), Lance Wade Cole Jr. (45), Wendy Diane Crites (46), Jeremy Jason Crock (47), Martha Ann Crock (48), Michael Bradley Decker (49), Zachary Thomas Doman (50), Tiffany Amber Fitch (51), Jama Richelle Fleetwood (52), Brooke Gordon (53), Marissa Gregory-Huntoon (54), Gary Edison Harder Jr. (55), Brenda Henry (56), John Ernest Lecluse (57), Michael Regale Luckett (58), Jeffrey Scott Main (59), Alyssa Rose Mcintyre (60), Connor James Mclaughlin (61), Jessica Lynn Mclaughlin (62), CJ Morgan (63), Nicole Parkinson (64), David Lewis Pennington Jr. (65), Delmar Seal Jr. (66), Cody Allen Sorrell (67), Jamie Lee Sullivan (68), Dusty Lynn Thompson (69), Shelby Elizabeth Thompson (70), Dante Dupe Washington (71), Clifford Eugene Weaver (72), Bradley David Welsh (73), April Dawn Wentzell (74), Autumn D. Wilson (75), Mary Ann Wright (76), John Wesley Yates (77), Cynthia Renee Young (78), Aaron Joshua James (79), Matthew David Viands (80), Daniel Lee Corbin Jr. (81), Jeremy Tyler Shifflett (82); to Seal Case

		as to Gary Bernard Brown, Jr, Eric Anthony Garner, Saul Percy Powell, Jr, Gary Brown, III, Gary Alexander Rodriguez, Charles Delroy Singletary, Sherron Briana Roberts, Deborah Rosemarie Johnson, Patrick Thomas Marple, Darien Jacob Horton, Jeffrey Lee Pullen, Christopher Sterling Cogle, Amber Jean Davis, Eric Lyn Custer, Benjamin Paul Knotts, Ashleigh Rae Settle, Kaitlyn Ashley Knight, John Andrew Cassell, Kristina Bridget Huth, Andrew Aiyetoro Wilkerson, Damian Antheny Costello, Haile Madalynn Speaks, Eva Louise Ashbaugh, Kayleigh Nicole Beavers, Ashley Nicole Story, Michael Lee Engle, Ryan Bennet Cole, Joshua Paul Barrett, Amanda Nicole Long, Gregory Brian Long, Paul Perekrests, Scott Alan Sheffer, Samantha Helen Hott, James Sanford, Lynn Wood Campbell, Nathaniel Frederick Downing, Jr, Linda Carasse Abshire, Amanda Nicole Albert, James Beau Baker, Kendall Axavier Baker, Kimberly Ann Barrett, Jennifer Nicole Barthlow, Ryan James Brennan, Gary Michael Burns, Lance Wade Cole, Jr, Wendy Diane Crites, Jeremy Jason Crock, Martha Ann Crock, Michael Bradley Decker, Zachary Thomas Doman, Tiffany Amber Fitch, Jama Richelle Fleetwood, Brooke Gordon, Marissa Gregory-Huntoon, Gary Edison Harder, Jr, Brenda Henry, John Ernest Lecluse, Michael Regale Luckett, Jeffrey Scott Main, Alyssa Rose Mcintyre, Connor James Mclaughlin, Jessica Lynn Mclaughlin, CJ Morgan, Nicole Parkinson, David Lewis Pennington, Jr, Delmar Seal, Jr, Cody Allen Sorrell, Jamie Lee Sullivan, Dusty Lynn Thompson, Shelby Elizabeth Thompson, Dante Dupe Washington, Clifford Eugene Weaver, Bradley David Welsh, April Dawn Wentzell, Autumn D. Wilson, Mary Ann Wright, John Wesley Yates, Cynthia Renee Young, Aaron Joshua James, Matthew David Viands, Daniel Lee Corbin, Jr, and Jeremy Tyler Shifflett Signed by Magistrate Judge Robert W. Trumble on 01/17/2024. (cwm) (Entered: 01/18/2024)
01/22/2024	<u>105</u>	MOTION for Detention by USA as to Jamie Lee Sullivan (68). (Attachment: # 1 Proposed Order)(cwm) (Entered: 01/22/2024)
01/23/2024	134	MOTION TO UNSEAL THE CASE by USA as to Gary Bernard Brown, Jr, Eric Anthony Garner, Saul Percy Powell, Jr, Gary Brown, III, Gary Alexander Rodriguez, Charles Delroy Singletary, Sherron Briana Roberts, Deborah Rosemarie Johnson, Patrick Thomas Marple, Darien Jacob Horton, Jeffrey Lee Pullen, Christopher Sterling Cogle, Amber Jean Davis, Eric Lyn Custer, Benjamin Paul Knotts, Ashleigh Rae Settle, Kaitlyn Ashley Knight, John Andrew Cassell, Kristina Bridget Huth, Andrew Aiyetoro Wilkerson, Damian Antheny Costello, Haile Madalynn Speaks, Eva Louise Ashbaugh, Kayleigh Nicole Beavers, Ashley Nicole Story, Michael Lee Engle, Ryan Bennet Cole, Joshua Paul Barrett, Amanda Nicole Long, Gregory Brian Long, Paul Perekrests, Scott Alan Sheffer, Samantha Helen Hott, James Sanford, Lynn Wood Campbell, Nathaniel Frederick Downing, Jr, Linda Carasse Abshire, Amanda Nicole Albert, James Beau Baker, Kendall Axavier Baker, Kimberly Ann Barrett, Jennifer Nicole Barthlow, Ryan James Brennan, Gary Michael Burns, Lance Wade Cole, Jr, Wendy Diane Crites, Jeremy Jason Crock, Martha Ann Crock, Michael Bradley Decker, Zachary Thomas Doman, Tiffany Amber Fitch, Jama Richelle Fleetwood, Brooke Gordon, Marissa Gregory-Huntoon, Gary Edison Harder, Jr, Brenda Henry, John Ernest Lecluse, Michael Regale Luckett, Jeffrey Scott Main, Alyssa Rose Mcintyre, Connor James Mclaughlin, Jessica Lynn Mclaughlin, CJ Morgan, Nicole Parkinson, David Lewis Pennington, Jr, Delmar Seal, Jr, Cody Allen Sorrell, Jamie Lee Sullivan, Dusty Lynn Thompson, Shelby Elizabeth Thompson, Dante Dupe Washington, Clifford Eugene Weaver, Bradley David Welsh, April Dawn Wentzell, Autumn D. Wilson, Mary Ann Wright, John Wesley Yates, Cynthia Renee Young,

		Aaron Joshua James, Matthew David Viands, Daniel Lee Corbin, Jr, and Jeremy Tyler Shifflett. (cwm) (Entered: 01/23/2024)
01/23/2024		Case unsealed as to Gary Bernard Brown, Jr, Eric Anthony Garner, Saul Percy Powell, Jr, Gary Brown, III, Gary Alexander Rodriguez, Charles Delroy Singletary, Sherron Briana Roberts, Deborah Rosemarie Johnson, Patrick Thomas Marple, Darien Jacob Horton, Jeffrey Lee Pullen, Christopher Sterling Cogle, Amber Jean Davis, Eric Lyn Custer, Benjamin Paul Knotts, Ashleigh Rae Settle, Kaitlyn Ashley Knight, John Andrew Cassell, Kristina Bridget Huth, Andrew Aiyetoro Wilkerson, Damian Antheny Costello, Haile Madalynn Speaks, Eva Louise Ashbaugh, Kayleigh Nicole Beavers, Ashley Nicole Story, Michael Lee Engle, Ryan Bennet Cole, Joshua Paul Barrett, Amanda Nicole Long, Gregory Brian Long, Paul Perekrests, Scott Alan Sheffer, Samantha Helen Hott, James Sanford, Lynn Wood Campbell, Nathaniel Frederick Downing, Jr, Linda Carasse Abshire, Amanda Nicole Albert, James Beau Baker, Kendall Axavier Baker, Kimberly Ann Barrett, Jennifer Nicole Barthlow, Ryan James Brennan, Gary Michael Burns, Lance Wade Cole, Jr, Wendy Diane Crites, Jeremy Jason Crock, Martha Ann Crock, Michael Bradley Decker, Zachary Thomas Doman, Tiffany Amber Fitch, Jama Richelle Fleetwood, Brooke Gordon, Marissa Gregory-Huntoon, Gary Edison Harder, Jr, Brenda Henry, John Ernest Lecluse, Michael Regale Luckett, Jeffrey Scott Main, Alyssa Rose Mcintyre, Connor James Mclaughlin, Jessica Lynn Mclaughlin, CJ Morgan, Nicole Parkinson, David Lewis Pennington, Jr, Delmar Seal, Jr, Cody Allen Sorrell, Jamie Lee Sullivan, Dusty Lynn Thompson, Shelby Elizabeth Thompson, Dante Dupe Washington, Clifford Eugene Weaver, Bradley David Welsh, April Dawn Wentzell, Autumn D. Wilson, Mary Ann Wright, John Wesley Yates, Cynthia Renee Young, Aaron Joshua James, Matthew David Viands, Daniel Lee Corbin, Jr, and Jeremy Tyler Shifflett. (cwm) (Entered: 01/23/2024)
01/23/2024	135	ORDER GRANTING GOVERNMENT'S MOTION TO UNSEAL CASE 134 Motion to Unseal Case as to Gary Bernard Brown Jr. (1), Eric Anthony Garner (2), Saul Percy Powell Jr. (3), Gary Brown III (4), Gary Alexander Rodriguez (5), Charles Delroy Singletary (6), Sherron Briana Roberts (7), Deborah Rosemarie Johnson (8), Patrick Thomas Marple (9), Darien Jacob Horton (10), Jeffrey Lee Pullen (11), Christopher Sterling Cogle (12), Amber Jean Davis (13), Eric Lyn Custer (14), Benjamin Paul Knotts (15), Ashleigh Rae Settle (16), Kaitlyn Ashley Knight (17), John Andrew Cassell (18), Kristina Bridget Huth (19), Andrew Aiyetoro Wilkerson (20), Damian Antheny Costello (21), Haile Madalynn Speaks (22), Eva Louise Ashbaugh (23), Kayleigh Nicole Beavers (24), Ashley Nicole Story (25), Michael Lee Engle (26), Ryan Bennet Cole (27), Joshua Paul Barrett (28), Amanda Nicole Long (29), Gregory Brian Long (30), Paul Perekrests (31), Scott Alan Sheffer (32), Samantha Helen Hott (33), James Sanford (34), Lynn Wood Campbell (35), Nathaniel Frederick Downing Jr. (36), Linda Carasse Abshire (37), Amanda Nicole Albert (38), James Beau Baker (39), Kendall Axavier Baker (40), Kimberly Ann Barrett (41), Jennifer Nicole Barthlow (42), Ryan James Brennan (43), Gary Michael Burns (44), Lance Wade Cole Jr. (45), Wendy Diane Crites (46), Jeremy Jason Crock (47), Martha Ann Crock (48), Michael Bradley Decker (49), Zachary Thomas Doman (50), Tiffany Amber Fitch (51), Jama Richelle Fleetwood (52), Brooke Gordon (53), Marissa Gregory-Huntoon (54), Gary Edison Harder Jr. (55), Brenda Henry (56), John Ernest Lecluse (57), Michael Regale Luckett (58), Jeffrey Scott Main (59), Alyssa Rose Mcintyre (60), Connor James Mclaughlin (61), Jessica Lynn Mclaughlin (62), CJ Morgan (63), Nicole Parkinson (64), David Lewis Pennington Jr. (65), Delmar Seal Jr. (66), Cody Allen Sorrell (67), Jamie Lee Sullivan (68), Dusty Lynn

01/23/2024	140	Briana Roberts, Deborah Rosemarie Johnson, Patrick Thomas Marple, Darien Jacob Horton, Jeffrey Lee Pullen, Christopher Sterling Cogle, Amber Jean Davis, Eric Lyn Custer, Benjamin Paul Knotts, Ashleigh Rae Settle, Kaitlyn Ashley Knight, John Andrew Cassell, Kristina Bridget Huth, Andrew Aiyetoro Wilkerson, Damian Antheny Costello, Haile Madalynn Speaks, Eva Louise Ashbaugh, Kayleigh Nicole Beavers, Ashley Nicole Story, Michael Lee Engle, Ryan Bennet Cole, Joshua Paul Barrett, Amanda Nicole Long, Gregory Brian Long, Paul Perekrests, Scott Alan Sheffer, Samantha Helen Hott, James Sanford, Lynn Wood Campbell, Nathaniel Frederick Downing, Jr, Linda Carasse Abshire, Amanda Nicole Albert, James Beau Baker, Kendall Axavier Baker, Kimberly Ann Barrett, Jennifer Nicole Barthlow, Ryan James Brennan, Gary Michael Burns, Lance Wade Cole, Jr, Wendy Diane Crites, Jeremy Jason Crock, Martha Ann Crock, Michael Bradley Decker, Zachary Thomas Doman, Tiffany Amber Fitch, Jama Richelle Fleetwood, Brooke Gordon, Marissa Gregory-Huntoon, Gary Edison Harder, Jr, Brenda Henry, John Ernest Lecluse, Michael Regale Luckett, Jeffrey Scott Main, Alyssa Rose Mcintyre, Connor James Mclaughlin, Jessica Lynn Mclaughlin, CJ Morgan, Nicole Parkinson, David Lewis Pennington, Jr, Delmar Seal, Jr, Cody Allen Sorrell, Jamie Lee Sullivan, Dusty Lynn Thompson, Shelby Elizabeth Thompson, Dante Dupe Washington, Clifford Eugene Weaver, Bradley David Welsh, April Dawn Wentzell, Autumn D. Wilson, Mary Ann Wright, John Wesley Yates, Cynthia Renee Young, Aaron Joshua James, Matthew David Viands, Daniel Lee Corbin, Jr, and Jeremy Tyler Shifflett. Signed by Magistrate Judge Robert W. Trumble on 01/23/2024. (cwm) (Entered: 01/23/2024) PAPERLESS ORDER as to Eric Anthony Garner, Saul Percy Powell, Jr, Darien Jacob Horton, Amber Jean Davis, Eric Lyn Custer, Andrew Aiyetoro Wilkerson, Damian Antheny Costello, Kayleigh Nicole Beavers, Ashley Nicole Story, Michael Lee Engle, Amanda Nicole Long, Gregory Brian Long, Scott Alan Sheffer, Samantha Helen Hott, Lynn Wood Ca
01/23/2024	196	PAPERLESS ORDER as to Gary Alexander Rodriguez, Michael Regale Luckett, CJ Morgan, and Jamie Lee Sullivan. Initial Appearances are set for 1/23/2024, at 01:00 PM in Martinsburg Magistrate Judge Courtroom, 1st Floor before Magistrate Judge Robert W. Trumble by videoconferencing from ERJ. Signed by Magistrate Judge Robert W. Trumble on 1-23-2024. (dh) (Entered: 01/23/2024)

CM/ECF - U.S. District Court:wvnd https://wvnd-ecf.sso.dcn/cgi-bin/DktRpt.pl?117950851688968-L_1_0-1 Case 3:24-mj-00011-JCH Document 1 Filed 01/23/24 Page 8 of 47 Pageid#: 8

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

GARY BERNARD BROWN, JR., aka Gee, ERIC ANTHONY GARNER, aka Pops, SAUL PERCY POWELL, JR., aka Protégé. GARY BROWN, III, aka G3, GARY ALEXANDER RODRIGUEZ, aka Mr. T, CHARLES DELROY SINGLETARY, SHERRON BRIANA ROBERTS, DEBORAH ROSEMARIE JOHNSON, PATRICK THOMAS MARPLE, DARIEN JACOB HORTON, aka Dee Jae, JEFFREY LEE PULLEN, CHRISTOPHER STERLING COGLE. AMBER JEAN DAVIS, ERIC LYN CUSTER, BENJAMIN PAUL KNOTTS, ASHLEIGH RAE SETTLE, KAITLYN ASHLEY KNIGHT, JOHN ANDREW CASSELL, KRISTINA BRIDGET HUTH, ANDREW AIYETORO WILKERSON, DAMIAN ANTHENY COSTELLO, HAILE MADALYNN SPEAKS, EVA LOUISE ASHBAUGH, KAYLEIGH NICOLE BEAVERS, ASHLEY NICOLE STORY, MICHAEL LEE ENGLE, RYAN BENNET COLE, JOSHUA PAUL BARRETT, AMANDA NICOLE LONG, GREGORY BRIAN LONG, PAUL PEREKRESTS, SCOTT ALAN SHEFFER, SAMANTHA HELEN HOTT, JAMES SANFORD, LYNN WOOD CAMPBELL, NATHANIEL FREDERICK DOWNING, JR., LINDA CARASSE ABSHIRE, AMANDA NICOLE ALBERT, JAMES BEAU BAKER, KENDALL AXAVIER BAKER, KIMBERLY ANN BARRETT, JENNIFER NICOLE BARTHLOW, RYAN JAMES BRENNAN, GARY MICHAEL BURNS,

LANCE WADE COLE, JR.,

Criminal Action No.: 3:24-CR-

Violations: 18 U.S.C. § 2

21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(A) 21 U.S.C. § 841(b)(1)(B) 21 U.S.C. § 841(b)(1)(C) 21 U.S.C. § 843(b) 21 U.S.C. § 843(d) 21 U.S.C. § 846

FILED

JAN 17 2024

U.S. DISTRICT COURT- WVND MARTINSBURG, WV 25401

WENDY DIANE CRITES, JEREMY JASON CROCK, MARTHA ANN CROCK, MICHAEL BRADLEY DECKER, ZACHARY THOMAS DOMAN, TIFFANY AMBER FITCH, JAMA RICHELLE FLEETWOOD, BROOKE GORDON, MARISSA GREGORY-HUNTOON, GARY EDISON HARDER, JR., BRENDA HENRY, JOHN ERNEST LECLUSE, MICHAEL REGALE LUCKETT, JEFFREY SCOTT MAIN, ALYSSA ROSE MCINTYRE, CONNOR JAMES MCLAUGHLIN, JESSICA LYNN MCLAUGHLIN, CJ MORGAN, NICOLE PARKINSON, DAVID LEWIS PENNINGTON, JR., DELMAR SEAL, JR., CODY ALLEN SORRELL, JAMIE LEE SULLIVAN, **DUSTY LYNN THOMPSON,** SHELBY ELIZABETH THOMPSON, DANTE DUPE WASHINGTON, CLIFFORD EUGENE WEAVER, BRADLEY DAVID WELSH, APRIL DAWN WENTZELL, AUTUMN D. WILSON, MARY ANN WRIGHT, JOHN WESLEY YATES, CYNTHIA RENEE YOUNG, AARON JOSHUA JAMES, MATTHEW DAVID VIANDS, DANIEL LEE CORBIN, JR., and JEREMY TYLER SHIFFLETT,

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute and to Distribute 400 Grams or More of a Fentanyl Mixture)

From on or about January 1, 2021 to on or about the return of this Indictment, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendants GARY BERNARD BROWN, JR., aka Gee, ERIC GARNER, aka Pops, SAUL PERCY POWELL, JR., aka Protégé, GARY BROWN, III, aka G3, GARY ALEXANDER RODRIGUEZ, aka Mr. T, and CHARLES DELROY SINGLETARY, did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding with each other and other persons to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and to distribute a mixture and substance containing 400 grams or more of a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

(Conspiracy to Possess with Intent to Distribute and to Distribute Fentanyl, Acetyl Fentanyl, Methamphetamine Hydrochloride, Cocaine, and Cocaine Base)

From on or about January 1, 2021 to on or about the return of this Indictment, in Berkelev. Hampshire, and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendants GARY BERNARD BROWN, JR., aka Gee, ERIC ANTHONY GARNER, aka Pops, SAUL PERCY POWELL, JR., aka Protégé, GARY BROWN, III, aka G3, GARY ALEXANDER CHARLES DELROY SINGLETARY, SHERRON BRIANA RODRIGUEZ, aka Mr. T, ROBERTS, DEBORAH ROSEMARIE JOHNSON, PATRICK THOMAS MARPLE, DARIEN JACOB HORTON, aka Dee Jae, JEFFREY LEE PULLEN, CHRISTOPHER STERLING COGLE, AMBER JEAN DAVIS, ERIC LYN CUSTER, BENJAMIN PAUL KNOTTS, ASHLEIGH RAE SETTLE, KAITLYN ASHLEY KNIGHT, JOHN ANDREW CASSELL, KRISTINA BRIDGET HUTH, ANDREW AIYETORO WILKERSON, DAMIAN ANTHENY COSTELLO, HAILE MADALYNN SPEAKS, EVA LOUISE ASHBAUGH, KAYLEIGH NICOLE BEAVERS, ASHLEY NICOLE STORY, MICHAEL LEE ENGLE, RYAN BENNET COLE, JOSHUA PAUL BARRETT, AMANDA NICOLE LONG, GREGORY BRIAN LONG, PAUL PEREKRESTS, SCOTT ALAN SHEFFER, SAMANTHA HOTT, JAMES SANFORD, LYNN WOOD CAMPBELL, NATHANIEL FREDERICK DOWNING, JR., LINDA CARASSE ABSHIRE, AMANDA NICOLE ALBERT, JAMES BEAU BAKER, KENDALL AXAVIER BAKER, KIMBERLY ANN BARRETT, JENNIFER NICOLE BARTHLOW, RYAN JAMES BRENNAN, GARY MICHAEL BURNS, LANCE WADE COLE, JR., WENDY DIANE CRITES, JEREMY JASON CROCK, MARTHA ANN CROCK, MICHAEL BRADLEY DECKER, DOMAN, TIFFANY AMBER FITCH, JAMA RICHELLE **THOMAS** ZACHARY FLEETWOOD, BROOKE ALLYSON GORDON, MARISSA GREGORY-HUNTOON, GARY EDISON HARDER, JR., BRENDA HENRY, JOHN ERNEST LECLUSE, MICHAEL REGALE

LUCKETT, JEFFREY SCOTT MAIN, ALYSSA ROSE MCINTYRE, CONNOR JAMES MCLAUGHLIN, JESSICA LYNN MCLAUGHLIN, CJ MORGAN, NICOLE PARKINSON, DAVID LEWIS PENNINGTON, JR., DELMAR SEAL, JR., CODY ALLEN SORRELL, JAMIE LEE SULLIVAN, DUSTY LYNN THOMPSON, SHELBY ELIZABETH THOMPSON, DANTE DUPE WASHINGTON, CLIFFORD EUGENE WEAVER, BRADLEY DAVID WELSH, APRIL DAWN WENTZELL, AUTUMN D. WILSON, MARY ANN WRIGHT, JOHN WESLEY YATES, CYNTHIA RENEE YOUNG, AARON JOSHUA JAMES, MATTHEW DAVID VIANDS, DANIEL LEE CORBIN, JR., and JEREMY TYLER SHIFFLETT, did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding with each other and other persons to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and to distribute fentanyl, a Schedule II controlled substance; acetyl fentanyl, a Schedule I controlled substance; methamphetamine hydrochloride, also known as "ice," a Schedule II controlled substance; cocaine hydrochloride, a Schedule II controlled substance; and cocaine base, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT THREE

(Distribution of Fentanyl Mixture)

On or about April 19, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **GARY BERNARD BROWN**, **JR.**, **aka Gee**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

(Possession with Intent to Distribute Fentanyl Mixture)

On or about May 17, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendants **DEBORAH ROSEMARIE JOHNSON and PATRICK THOMAS MARPLE**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Distribution of Fentanyl Mixture)

On or about May 25, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **ERIC LYN CUSTER**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Possession with Intent to Distribute Fentanyl Mixture)

On or about May 26, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **ERIC LYN CUSTER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

(Possession with Intent to Distribute Fentanyl Mixture)

On or about May 27, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **BENJAMIN PAUL KNOTTS**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about June 1, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **DARIEN JACOB HORTON**, **aka Dee Jae**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about June 13, 2023, in Berkeley County, in the Northern District of West Virginia, defendant **DELMAR SEAL**, **JR.**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT TEN

(Distribution of Fentanyl Mixture)

On or about June 15, 2023, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendant **GARY BERNARD BROWN**, **JR.**, **aka Gee**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

(Possession with Intent to Distribute Fentanyl and Acetyl Fentanyl Mixture)

On or about June 15, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **JOHN ANDREW CASSELL and AMANDA NICOLE ALBERT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

(Distribution of Fentanyl Mixture)

On or about June 28, 2023, in Berkeley County, in the Northern District of West Virginia, and elsewhere, defendants **DELMAR SEAL**, **JR. and ALYSSA ROSE MCINTYRE**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about July 6, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **GREGORY BRIAN LONG**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(Possession with Intent to Distribute a Fentanyl Mixture)

On or about July 7, 2023, in Berkeley County, in the Northern District of West Virginia, defendant **MARY ANN WRIGHT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 1, 2023, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, defendant **DEBORAH ROSEMARIE JOHNSON**, aided and abetted by **JEREMY TYLER SHIFFLETT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Unlawful Use of Communication Facility)

On or about August 5, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **EVA LOUISE ASHBAUGH**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT SEVENTEEN

(Possession with Intent to Distribute Fentanyl and Acetyl Fentanyl Mixture)

On or about August 5, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **EVA LOUISE ASHBAUGH and CONNOR JAMES MCLAUGHLIN**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

(Unlawful Use of Communication Facility)

On or about August 7, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **KRISTINA BRIDGET HUTH**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT NINETEEN

(Unlawful Use of Communication Facility)

On or about August 7, 2023, in Jefferson County, in the Northern District of West Virginia and elsewhere, defendant **JAMES BEAU BAKER**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance, and cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about August 8, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **KAYLEIGH NICOLE BEAVERS**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Possession with Intent to Distribute Fentanyl and Acetyl Fentanyl Mixture)

On or about August 8, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **WENDY DIANE CRITES**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-TWO

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 11, 2023, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, defendants **SHELBY ELIZABETH THOMPSON** and **DUSTY LYNN THOMPSON**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-THREE

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 15, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **MICHAEL LEE ENGLE and JAMA RICHELLE FLEETWOOD** did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FOUR

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 16, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **RYAN BENNET COLE**, aided and abetted by **MATTHEW DAVID VIANDS**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FIVE

(Possession with Intent to Distribute Fentanyl Mixture)

On or about August 31, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **JOSHUA PAUL BARRETT and KIMBERLY ANN BARRETT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SIX

(Possession with Intent to Distribute Fentanyl Mixture)

On or about October 4, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **NATHANIEL FREDERICK DOWNING, JR.**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SEVEN

(Unlawful Use of Communication Facility)

On or about October 10, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **DANIEL LEE CORBIN**, **JR.**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendants used a Facebook Messenger account to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-EIGHT

(Unlawful Use of Communication Facility)

On or about October 11, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **PAUL PEREKRESTS**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance, and methamphetamine hydrochloride, also known as "ice," a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-NINE

(Possession with Intent to Distribute 40 Grams or More of Fentanyl Mixture)

On or about October 11, 2023, in Berkeley County, in the Northern District of West Virginia, defendants **PAUL PEREKRESTS and KENDALL AXAVIER BAKER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute forty grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THIRTY

(Possession with Intent to Distribute Methamphetamine Hydrochloride)

On or about October 11, 2023, in Berkeley County, in the Northern District of West Virginia, defendants **PAUL PEREKRESTS and KENDALL AXAVIER BAKER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute methamphetamine hydrochloride, also known as "ice," a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-ONE

(Unlawful Use of Communication Facility)

On or about October 24, 2023, in Jefferson County, in the Northern District of West Virginia and elsewhere, defendant **JENNIFER NICOLE BARTHLOW**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance, and methamphetamine hydrochloride, also known as "ice," a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT THIRTY-TWO

(Possession with Intent to Distribute Fentanyl Mixture)

On or about November 14, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **GREGORY BRIAN LONG and AUTUMN D. WILSON**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-THREE

(Possession with Intent to Distribute Fentanyl Mixture)

On or about November 15, 2023, in Hampshire County, in the Northern District of West Virginia, defendants **JEREMY JASON CROCK and MARTHA ANN CROCK**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FOUR

(Possession with Intent to Distribute Methamphetamine)

On or about November 15, 2023, in Hampshire County, in the Northern District of West Virginia, defendants **JEREMY JASON CROCK and MARTHA ANN CROCK**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code,

Sections 841 and 846, the government will seek the forfeiture of property as part of the sentence imposed

in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate

the commission of the above referenced offense, and any property constituting, or derived from, proceeds

obtained directly or indirectly, as a result of such offense, including \$55,871.85 from JP Morgan Chase

bank accounts; \$5,938; a 9mm Jimenez firearm bearing serial number 168201 with a magazine and

ammunition; various designer and luxury items, to include but not limited to, clothing, bags, shoes, and

jewelry seized from 555 President Street, Apartment 401, Baltimore, Maryland 21202 and 250 Mission

Road, Apartment 507, Baltimore, Maryland.

A true bill,

s/

Grand Jury Foreperson

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WILLIAM IHLENFELD United States Attorney

Lara K. Omps-Botteicher

Eleanor F. Hurney

Kyle R. Kane

Morgan C. McKee

Assistant United States Attorneys

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UNITED STATES DISTRICT COURT

for the

Northern District of West Virginia					
United States of America v.) Jamie Lee Sullivan) 11622967) 2487-0118-0320-J Defendant	RECEIVED By PTaylor at 3:50 pm, Jan 18, 2024				
ARREST V	VARRANT				
To: Any authorized law enforcement officer					
YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested)					
(2) Conspiracy to PWID and to Distribute Fentanyl, Acetyl Fen Cocaine Base.	tanyl, Methamphetamine Hydrochloride, Cocaine, and				
Date:01/17/2024 City and state:Martinsburg, WV	Robert W. Trumble, United States Magistrate Judge Printed name and title				
Return					
This warrant was received on (date)01/18/2024 at (city and state)Orange County, Virginia	, and the person was arrested on (date) 1/23/2024				
Date:1/23/2024	Arresting officer's signature				
	For: FB JC Williams/ Deputy US Marshal Printed name and title				